

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

STEPHEN McCOLLUM, STEPHANIE	§	
KINGREY, and SANDRA McCOLLUM,	§	
individually and as heirs at law to the Estate of	§	
LARRY GENE McCOLLUM,	§	
PLAINTIFFS	§	
	§	
v.	§	CIVIL ACTION NO. 3:12-CV-2037-L
	§	
BRAD LIVINGSTON, JEFF PRINGLE, and	§	
TEXAS DEPARTMENT OF CRIMINAL	§	
JUSTICE.	§	
DEFENDANTS	§	

**PLAINTIFFS' UNOPPOSED MOTION TO AMEND SCHEDULING ORDER**

The parties are in the process of scheduling depositions. Due to the holidays, and the number of witnesses, the parties need additional time to take the fact witnesses relevant to the claims and so that experts have time to review them and prepare reports.

Accordingly, Plaintiffs ask that the deadlines be extended as follows:

- a) The deadline to add parties and amend pleadings April 1, 2013.
- b) Plaintiff's Expert Designations and Rule 26(a)(2)(B) disclosures – April 13, 2013;
- c) Defendants' Expert Designations and Rule 26(a)(2)(B) disclosures – May 13, 2013;
- d) Discovery – September 1, 2013;
- e) Mediation – March 15, 2013;
- f) Dispositive Motions – August 1, 2013.

Extending time deadlines will not delay trial, which is set for October 7, 2013.

Defendants' counsel are not opposed and are in agreement with the motion.

Respectfully submitted,

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By /s/ Jeff Edwards

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF CONFERENCE**

Plaintiffs' counsel has conferred with Defendants' counsel concerning this motion and reached an agreement.

\_\_\_\_\_/s/  
Jeff Edwards

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29<sup>th</sup> day of January 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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\_\_\_\_\_/s/  
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